

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE,

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**JOINT MOTION FOR ENTRY OF AMENDED SCHEDULING ORDER**

Plaintiff Students for Fair Admissions, Inc. (“SFFA”) and Defendant President and Fellows of Harvard College (“Harvard”) hereby jointly move this Court for entry of an amended scheduling order.

The Court recently ordered the production of additional materials by Harvard in this case. Dkt. 362. To accommodate the production of materials responsive to that and prior orders of the Court, the parties jointly seek an order revising portions of the expert discovery schedule—but not the dispositive motion schedule—reflected in the Court’s prior order of June 27, 2017. Dkt. 335.:

1. Plaintiff’s experts shall be designated and the information required by Fed. R. Civ. P. 26(a)(2) shall be disclosed by October 16, 2017.
2. Defendant’s experts shall be designated and the information required by Fed. R. Civ. P. 26(a)(2) shall be disclosed by December 15, 2017.
3. Plaintiff’s rebuttal expert reports shall be disclosed by January 29, 2018.
4. Defendant’s rebuttal expert reports shall be disclosed by March 15, 2018.
5. All other deadlines shall remain the same as previously ordered by the Court:

- a. Expert discovery, including expert depositions, shall be completed by May 1, 2018.
- b. All dispositive motions under Fed. R. Civ. P. 56 shall be filed by June 15, 2018. Opposition briefs shall be filed by July 30, 2018. Reply briefs shall be filed by August 30, 2018.

SFFA and Harvard respectfully request that the Court enter a revised scheduling order as described above.

Respectfully submitted,

Paul M. Sanford BBO #566318  
Benjamin C. Caldwell BBO #675061  
BURNS & LEVINSON LLP  
One Citizens Plaza, Suite 1100  
Providence, RI 02903  
Tel: 617-345-3000  
Fax: 617-345-3299  
psanford@burnslev.com  
bcaldwell@burnslev.com

/s/ Patrick Strawbridge

William S. Consovoy  
Thomas R. McCarthy  
Michael H. Park  
J. Michael Connolly  
CONSOVOY MCCARTHY PARK PLLC  
3033 Wilson Boulevard, Suite 700  
Arlington, Virginia 22201  
Tel: 703-243-4923  
Fax: 703.243.4923  
will@consovoymccarthy.com  
tom@consovoymccarthy.com  
park@consovoymccarthy.com  
mike@consovoymccarthy.com

Dated: September 20, 2017

Patrick Strawbridge BBO #678274  
CONSOVOY MCCARTHY PARK PLLC  
Ten Post Office Square  
8th Floor South PMB #706  
Boston, MA 02109  
Tel: 617-227-0548  
patrick@consovoymccarthy.com

*Counsel for Plaintiff Students for Fair  
Admissions, Inc.*

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth (BBO #665232)  
William F. Lee (BBO #291960)  
Andrew S. Dulberg (BBO #675405)  
Elizabeth Mooney (BBO #679522)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
Tel: (617) 526-6000  
Fax: (617) 526-5000  
felicia.ellsworth@wilmerhale.com  
william.lee@wilmerhale.com

Seth P. Waxman (*pro hac vice*)  
Paul R.Q. Wolfson (*pro hac vice*)  
Daniel Winik (*pro hac vice*)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Ave. NW  
Washington, D.C. 20006  
Tel: (202) 663-6800  
Fax: (202) 663-6363  
seth.waxman@wilmerhale.com  
paul.wolfson@wilmerhale.com  
daniel.winik@wilmerhale.com

Debo P. Adegbile (*pro hac vice*)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Tel: (212) 295-6717  
Fax: (212) 230-8888  
debo.adegbile@wilmerhale.com

Dated: September 20, 2017

*Counsel for Defendant President and  
Fellows of Harvard College*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a)(2), I hereby certify that Harvard joins in this motion and consents to the requested relief.

s/ Patrick Strawbridge  
Patrick Strawbridge

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

s/ Patrick Strawbridge  
Patrick Strawbridge